

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America  
v.  
Christopher JOHNSON

Case: 2:20-mj-30401  
Assigned To : Unassigned  
Assign. Date : 9/25/2020  
CMP: USA v JOHNSON (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2020 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. 922(g)(1)

*Offense Description*  
Felon in possession of a firearm

This criminal complaint is based on these facts:  
See attached AFFIDAVIT.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

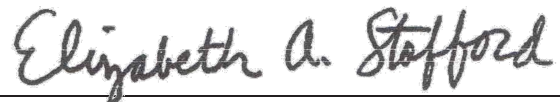
Date: September 25, 2020

City and state: Detroit, Michigan



*Complainant's signature*

Sean Hochradel, Task Force Officer (ATF)  
*Printed name and title*



*Judge's signature*

Hon. Elizabeth A. Stafford, United States Magistrate Judge  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Sean E Hochradel, being duly sworn, do hereby state the following:

**I. INTRODUCTION**

1. I am a duly sworn Detective with the City of Detroit Police Department and has been for over fifteen years. For the last four years, I have been assigned to the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) as a Task Force Officer (TFO). I am currently assigned to the Detroit Field Division, Group III. I am tasked with investigating violations of firearms, narcotics laws, and suspicious or incendiary fires. I have an Associate's Degree in Criminal Justice from Schoolcraft Community College. I am working toward a Bachelor's Degree from Cleary University for Interdisciplinary Studies. I have completed six months of training at a police academy through the State of Michigan with yearly continued education and training.

2. I have participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal gangs. Through various investigations, my training and experience, and conversations with other agents and other law enforcement personnel, I have become familiar with state and federal firearms violations.

3. This affidavit is based on personal knowledge from my participation in this investigation, including interviews by myself and/or other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. The information outlined below is for the limited purpose of obtaining a criminal complaint and an arrest warrant. I have not set forth each and every fact known to law enforcement related to this investigation.

4. Probable cause exists that Christopher Dejuan JOHNSON (DOB 08/XX/1986) violated 18 U.S.C. § 922(g)(1) (felon in possession of a firearm) on or about September 24, 2020, in the Eastern District of Michigan.

## **II. SUMMARY OF THE INVESTIGATION**

5. On September 24, 2020, the Michigan Department of Corrections (MDOC) accompanied by Detroit Police Department (DPD) officers, conducted a Parole Home Compliance Check on Christopher JOHNSON on Prairie Street, in Detroit. According to MDOC, JOHNSON lives at the Prairie address as a parolee.

6. JOHNSON's Order of Parole-Special Condition 4.2 mandates JOHNSON to voluntarily consent to a search of his person and property upon demand by a peace officer or parole officer.

7. Upon their approach to the Prairie residence, MDOC and DPD officers observed JOHNSON exit the side door and enter the backyard. Officers made contact with JOHNSON in the backyard. JOHNSON was advised that the officers were present to conduct a MDOC Compliance Check. JOHNSON indicated that his aunt would direct officers to his room so he could remain with his mother who was outside of the residence.

8. Pursuant to Special Condition 4.2, MDOC Agent Theresa Krzyzak, DPD Sergeant Kevin Drury, and DPD Officer Robert Stankiewicz searched JOHNSON's room. The following items were recovered:

- a. One American Tactical, Omni Hybrid, Multi-caliber firearm, loaded with one live round in the chamber and a double drum high capacity magazine inserted containing 72 live rounds of 5.56mm ammunition, recovered from the upper shelf of the closet;

- b. One Glock 23, .40 caliber pistol, loaded with one live round in the chamber and a magazine inserted containing 21 live rounds of .40 caliber ammunition, recovered from the bed; and
- c. “Eastern Michigan Iron Workers” documents containing JOHNSON’s name and the Prairie Street, address.

9. A subsequent computer check revealed that the Glock was reported stolen by the Dearborn Police Department on December 12, 2015.

10. I reviewed JOHNSON’s criminal history. He has been convicted of the following felonies in 2009 in the Michigan Third Judicial Circuit, Wayne County: assault with a dangerous weapon, felony firearm, first degree home invasion, and unlawful imprisonment.

11. JOHNSON is currently on parole until October 2020.

12. On September 24, 2020, I contacted Interstate Nexus Expert ATF Special Agent Michael Jacobs. SA Jacobs advised, based upon the description provided, without physically examining the firearms, that the firearms are firearms as defined under 18 U.S.C. § 921 and were

manufactured outside of the state of Michigan after 1898, and therefore the firearm has traveled in and affected interstate commerce.

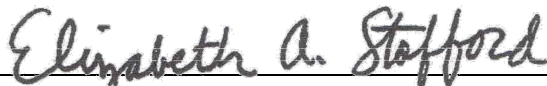
### III. CONCLUSION

13. Probable cause exists to believe that Christopher JOHNSON, a prior convicted felon, did knowingly and intentionally possess a firearm that traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).



Task Force Officer Sean Hochradel  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Subscribed and sworn before me or  
by reliable electronic means.



ELIZABETH A. STAFFORD  
UNITED STATES MAGISTRATE JUDGE

September 25, 2020